

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***RESPONSE TO COMMENTS***

TITLE V (DRAFT PERMIT) NO. V-04-044

ARKEMA, INC.  
CARROLLTON, KY

February 7, 2006

RON SCHNEIDER, REVIEWER  
Source I.D. #: 021-041-00002  
Source A.I. #: 690  
Activity #: APE20040002

**SOURCE DESCRIPTION:**

A Title V permit application was received from Elf Atochem North America, Inc. (now known as Arkema, Inc.) on December 14, 1998 and was complete on May 26, 2000. In addition to serving as the initial Title V permit for Arkema, this also serves as a construction permit for three production areas (B-6, B-33, and B-39) at the facility. Production has been discontinued at these areas of the plant pending connection of vents from these three buildings to the source-wide thermal oxidizer (IR-7401) in accordance with the Arkema's consent decree with the US Environmental Protection Agency.

**PUBLIC AND U.S. EPA REVIEW:**

On December 23, 2005, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Madison Courier* of Madison, Indiana. The public notice also indicated that a public hearing would be held at the Carroll County Courthouse on January 23, 2006 at 6:00 pm. The public comment period expired 30 days from the date of publication.

***Comment received:***

Comments were received from Arkema, Inc. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received; however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

***Public hearing:***

A public hearing regarding this permit was held on January 23, 2006 at the Carroll County Courthouse. At the public hearing, the only comment made was by Jim Stamm of Arkema. The comment was that Arkema had previously submitted written comments regarding this permit. The Division acknowledges receipt of Arkema's comments, which are addressed in Attachment A.

## ATTACHMENT A

### Response to Comments

**Comments:** on Draft Title V Air Quality Permit submitted by Jim Stamm, HES Manager for Arkema, Inc. Responses by the Kentucky Division for Air Quality are included after each comment.

- 1) Arkema requests that the Kentucky Division for Air Quality (KDAQ) change the following language: “*At the beginning of each month...*” to: “*Within 30 days following the conclusion of each month...*” as listed below throughout the draft Title V Permit.

Page 2	B.1 – Operating Limitations – Compliance Demonstration Method
Page 4	B.2 – Emission Limitations – Compliance Demonstration Method
Page 10	B.1.b – Operating Limitations – Compliance Demonstration Method
Page 28	B.4.b – Specific Monitoring Requirements
Page 46	B.1 – Operating Limitations – Compliance Demonstration Method
Page 80	B.5.a – Specific Recordkeeping Requirements (insert parenthetically after “Monthly”)
Page 90	D.2.d – Emission Limitations – Compliance Demonstration Method

Each of the changes requested above has been made for the corrections on pp. 2, 4, 10, 46, and 90.

On p. 28, B.4.b was changed from “The permittee shall calculate the monthly and annual (12-month rolling total) VOC emission rates from this Emission Point on a monthly basis” to “The permittee shall calculate the monthly VOC emission rates from each affected Emission Point. Compliance with the annual limit shall be based on the rolling 12 month total. Within 30 days following the conclusion of each month, the rolling 12-month total shall be calculated for the preceding 12 months”.

On p. 80, B.5.a. was changed from “Monthly and twelve month rolling totals of the wastewater treatment plant throughput” was changed to “Monthly totals of the wastewater treatment plant throughput. Compliance with the annual limit shall be based on the rolling 12 month total. Within 30 days following the conclusion of each month, the rolling 12-month total shall be calculated for the preceding 12 months”.

- 2) Arkema requests that following the sentence: “*Pursuant to 401 KAR 59:015, Section 4(2), the opacity of visible emissions shall not exceed twenty (20) percent.*” KDAQ insert the following language: “*...as prescribed by 40 CFR 60, Appendix A, Method 9.*” in section B.2.d – Emission Limitations (B-02, page 3) of the draft Title V Permit.

The requested change has been made.

- 3) Arkema requests that following the sentence: “*Pursuant to 401 KAR 59:010, Section 3, no person shall cause, suffer, allow, or permit any continuous emissions into the open air from a control device or stack which is equal to or greater than twenty (20) percent opacity.*” KDAQ insert the following language: “*...as prescribed by 40 CFR 60, Appendix A, Method 9.*” as listed below throughout the draft Title V Permit.

Page 7	B.2.c – Emission Limitations
Page 22	B.2.b – Emission Limitations

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Page 27 B.2.b – Emission Limitations  
Page 33 B.2.c – Emission Limitations  
Page 41 B.2.b – Emission Limitations

The requested changes have been made.

- 4) Arkema requests KDAQ's confirmation that Section A – Permit Authorization (page 1) and 401 KAR 52:020 allow for Arkema to make operational changes and to introduce new products or raw material without a permit application in accordance with 401 KAR 52:020 Section 6 (Insignificant and Trivial Activities), Section 17 (Off Permit Changes) and Section 18 (Section 502(b)10 Changes).

The Division confirms that operational changes are permitted under Sections 6, 17, and 18 of 401 KAR 52:020, without a permit application, so long as proper notification to the Division is made in accordance with 401 KAR 52:020, Section 17(2) or Section 18(2), whichever may be applicable.

- 5) Section B.4.b – (B-03, page 9) requires monitoring control device parameters per frequency in the control device table (Subsection B.7.) but said table does not identify a monitoring frequency for Caustic Scrubber TK-0356. Arkema requests that KDAQ update the control device table to indicate that operating parameters are to be monitored *once per day*. This is consistent with other similar control devices through out the draft Title V Permit.

A monitoring frequency of once per day is specified in the table mentioned here for each parameter of TK-0356 (the control equipment for emission points 09 (RC03) and 10 (RX03)).

- 6) Arkema requests that KDAQ change "*Flakier*" to "*Flaker*" for Emission Point 12 (EF03) in Section B.7 – Specific Control Equipment Operating Conditions (B-03, page 9).

The requested change has been made.

- 7) Arkema requests that KDAQ remove the language: "...and maintain records of..." from Section B.4.b – Specific Monitoring Requirements (B-05, page 11). Arkema also requests that Section B.5.c – Specific Recordkeeping Requirements (B-05, page 11) be replaced in its entirety with the following language: "*The permittee shall maintain records of butyl crude assays showing specifically the dibutyl ether content of each shipment of butyl crudes.*"

The requested changes have been made.

- 8) In Section B.7 (B-22, page19) CO-2275 is incorrectly described in the control equipment table as a "Venturi" scrubber. Arkema requests that KDAQ replace "*Venturi Type 974*" with "*Packed bed*".

The requested change has been made.

- 9) Arkema requests that KDAQ make the following changes to the table in Section B.2.a – Compliance Demonstration Method (B-27, page 22). Highlighted texts are corrections and strikethrough texts are deletions.

Emission Point	Process ID	Product	Maximum Throughput (lbs/hr)	Emission Factor Reference (lbs/lb)	Control Efficiency
42 (DR27)	DR-2783 & DR-	BSA DRY	114	7.15 E-4	99.5%

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	2793	Dibutyltin Oxide DRY	799	1.81 E-5	99.5%
		Fascat 4101 DRY	114	1.16 E-3	99.5%
		Fascat 4350 Catalyst	57	1.16 E-3	99.5%
		Tetraphenyltin DRY	833	1.29 E-4	0% 99.5%
		Thermolite 813	57	3.30 E-4	99.5%
		TPTH	1,250	0.0153	99.0% (B-03 dust collectors)
		TPTH	1,250	6.77 E-6 0.0153	99.5% (DU-2729 dust collector)
44 (DT27)	DT-27	BSA DRY	114	1.75 E-7	0%
		Dibutyltin Oxide DRY	799	7.04 E-8	0%
		Fascat 4101 DRY	114	3.50 E-6	0%
		Tetraphenyltin DRY	833	1.14 E-7	0%
		Thermolite 813	57	2.23 E-8	0%
		TPTH	1,250	8.59 E-9	0%
45 (FS27)	MI-2710	BSA DRY	114	1.76 E-5	99.0% 99.5%
		Dibutyltin Oxide DRY	799	7.05 E-6	99.0% 99.5%
		Thermolite 813	57	7.00 E-6	99.0% 99.5%

All particulate emissions that are controlled from B-27 use dust collector DU-2729. The 99.5% efficiency is consistent for all product emissions controlled by DU-2729. For Emission Point 42 (DR27), two entries are listed for TPTH. There is no B-03 dust collector. All particulate emissions from TPTH are controlled by DU-2729. The emission factor references and control efficiencies have been corrected and combined as shown in the table above to reflect this.

The requested changes have been made.

- 10) Arkema requests KDAQ's confirmation that the above Compliance Demonstration table as well as all other similar tables throughout Section B of the draft Title V Permit are for compliance demonstration purposes and are considered strictly informational. Therefore, any change to the information in this table or other similar tables will not necessarily require a major/minor modification to the Title V Permit. Arkema also requests that KDAQ add a footnote to each of these tables (pages 8, 23, 27, 33, and 41) stating the following: "Emission factors in this table are only intended as a reference for compliance demonstration purposes and are not considered enforceable applicable requirements. Emission factors are subject to revision based on process changes, changes in EPA emissions guidance, conformance with process knowledge and/or data, and other regulatory changes that may affect emissions factor calculations."

The Division acknowledges that the tables indicated are for compliance demonstration purposes. Changes to the information in the tables would only obligate Arkema to apply for a permit modification if such a modification were dictated by 401 KAR 52:020, Section 14 or 16. However, the Division believes it is not necessary to expressly state this in the permit.

- 11) Arkema requests that KDAQ delete Section B.2.c – Compliance Demonstration Method (B-28, page 27) in its entirety. No solvents are used in B-28 so the proposed calculation methodology would be implausible. Arkema will use established emission factors to calculate VOC emissions based on production. Arkema requests that the deleted language be replaced by the following: "Compliance with the annual VOC emission limit shall be based on the rolling 12 month total. Within 30 days following the conclusion of each month, the rolling 12 month total shall be calculated for the past 12 months."

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The requested change has been made, except that “past 12 months” is replaced with “preceding 12 months” for consistency.

- 12) Arkema requests that “...each month...” be deleted from Section B.6 – Specific Reporting Requirements (B-28, page 28). Arkema also requests that “...month’s...” be replaced by “...months’...”

This is an administrative error. The requested changes have been made.

- 13) Arkema requests that KDAQ make the following changes to the table in Section B.2.b – Compliance Demonstration Method (B-32, page 33). Highlighted texts are additions to the table.

Emission Point	Process ID	Product	Maximum Throughput (lbs/hr)	Emission Factor Reference (lbs/lb)	Control Efficiency
71 (DR32)	BL-3219	Dibutyltin Oxide DRY (Fascat 4201)	1,113.88	1.11 E-2	99.9%
		BSA DRY	35.59	1.11 E-2	99.9%
		Fascat 4101 Dry	76.92	5.57 E-3	99.9%
		S-28	1,113.88	1.20 E-3	99.9%
		Triphenyltin Hydroxide (TPTH)	114.16	8.90 E-3	99.9%

The additional products are listed in the Pollutant of Concern (POC) table along with Dibutyltin Oxide for Emission Point 71 (DR32) and should be listed in this table for consistency with other similar tables throughout the draft Title V permit.

The requested changes have been made.

- 14) Arkema requests the KDAQ delete the language “...and Thermal Oxidizer and scrubber (IR-7401).” From Section B – Control Equipment (B-48, page 45). Because Arkema has discontinued the use of heptane in B-48, per the conditions of the Consent Decree, IR-7401 is not required to be used as a control device for this area.

The requested change has been made.

- 15) Arkema requests that KDAQ replace the following language: “...monthly and 12 consecutive month...” with “...rolling 12 month...” in Section B.6.a – Specific Reporting Requirements (B-48, page 47). The Operating Limitations for B-48 (page 45) restrict production of stabilizers to 80,000,000 lbs during any 12 consecutive months. Arkema’s proposed language is consistent with the operating limitation and language throughout the permit.

The requested change has been made.

- 16) Arkema requests that KDAQ remove “40 CFR 61 Subpart C – National Emission Standard for Beryllium” from the Section B – Applicable Regulations (B-52, page 49). The regulation applies to extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste. Arkema does not process beryllium, beryllium ore, oxides, alloys, or wastes nor does Arkema accept wastes to be burned from any of the Subpart E covered processes. Therefore, 40 CFR 61 Subpart C is not applicable.

The requested change has been made. This has been deleted in the Statement of Basis as

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well.

- 17) Arkema requests that KDAQ remove “40 CFR 61 Subpart E – National Emission Standard for Mercury” from the Section B – Applicable Regulations (B-52, page 49). The regulation applies to stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge. Arkema does not process mercury or use mercury chlor-alkali cells. Therefore 40 CFR 61 Subpart E is not applicable.

40 CFR 61 Subpart E does apply to this facility because Arkema incinerates wastewater treatment sludge. This condition remains in the permit.

- 18) Section B (B-52, pages 49-74) references continuous opacity monitoring systems (COMS). As described in 40 CFR 63.1209(a)(1)(ii) and 40 CFR 63.1209(f)(3), COMS are only required for cement kilns burning hazardous waste. Arkema requests that KDAQ delete the following references to COMS in the draft Title V Permit.

Page 51	2(v) – Operating Limitations (5 <sup>th</sup> line) “...or COMS...”
Page 51	2(v)(2) – Operating Limitations (2 <sup>nd</sup> line) “...or COMS...”
Page 69	4.a.1 – Specific Monitoring Requirements “...and continuous opacity monitoring systems (COMS).”
Page 69	4.a.1.c – Specific Monitoring Requirements (2 <sup>nd</sup> line) “...and COMS...” and “...and Performance Specifications 1 (opacity).”

The requested changes have been made, except that “and” was not deleted in “and Performance Specifications 1 (opacity)...”.

- 19) Arkema requests that KDAQ delete Section B.1.a.6(iv) – Operating Limitations (B-52, page 56) in its entirety as it only applies to cement kilns and lightweight aggregate kilns.

The Division acknowledges that Section B.1.a.6(iv) is not applicable, as Arkema operates no cement kiln or lightweight aggregate kiln at its Carrollton facility. However, for ease of reconciling cross references, B.1.a.6(v) will remain in the permit.

- 20) Arkema requests that KDAQ delete the following language: “...a CEMS...” and replace it with: “...either a carbon monoxide or hydrocarbon CEMS...” in Section B.4.a.1.a – Specific Monitoring Requirements (B-52, page 69)

The requested change has been made.

- 21) Arkema requests that KDAQ add the following language to the end of Section B.4.a.1.b – Specific Monitoring Requirements (B-52, page 69): “...However, compliance with the requirements in this section to install, calibrate, maintain, and operate the PM CEMS is not required until such time that the Agency promulgates all performance specifications and operating requirements applicable to PM CEMS.” Please note the U.S. EPA has not currently promulgated any performance specifications for PM CEMS, therefore, Arkema has no requirement to install such equipment at this time.

The requested change has been made.

- 22) Arkema requests that KDAQ delete Section B.4.a.11.e – Specific Monitoring Requirements (B-52, page 70) in its entirety. The particulate matter operating limit only applies to facilities that operate

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activated carbon injection systems.

The requested change has been made.

- 23) In Section B (B-67, page 79) Emission Point 175 (WT) is incorrectly listed as *Ferric Chloride Tank, TK-5260*. Arkema requests that KDAQ change this to *Ferric Chloride Tank, TK-5290*.

The requested change has been made.

- 24) Arkema requests that KDAQ remove all B-38 insignificant sources from Section C – Insignificant Activities (page 86). B-38 has been shutdown indefinitely and this equipment is no longer in service. Arkema requested that the VOC point sources from B-38 be removed from all existing air permits associated with it in a letter addressed to KDAQ dated November 30, 2005.

The requested change has been made.

- 25) Arkema requests that KDAQ change the following language in Section D (page 88, 2<sup>nd</sup> paragraph, 3<sup>rd</sup> line): “... *Once per week, during discharge*...” to “... *Once per week, during charge or discharge*...” to be consistent throughout this requirement.

Rather than make the change as requested, the Division prefers to change “during charge or discharge” in the first sentence of that paragraph to read “during discharge”; and to change item i in that paragraph to read “The date, time, and duration of the process of discharging;”. The transfer of dried product during discharge is the worst-case scenario with regard to the generation of opacity and is the time during which opacity monitoring is most critical.

- 26) Arkema requests that KDAQ insert the following language as condition (i) in Section D (page 88, 4<sup>th</sup> paragraph): “*i. The date and time the emission point in operation was being observed.*” This is consistent with the previous opacity monitoring requirement and provides a means of verifying the “once per week” requirement.

The requested change has been made.

- 27) In Section E.4.3 – Specific Monitoring Requirements (page 92), Arkema requests that KDAQ change the last sentence to “*Annual visual inspections shall be performed on the burner by trained personnel.*”

The requested change has been made.

- 28) Arkema requests that KDAQ revise Section G.a.15 – General Provisions (page 98) to state: “*This permit consolidates the authority of any **effective** previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission points and incorporates all requirements of those existing permits into one single permit for this source.*” The addition of the word “**effective**” is to clarify that obsolete terms and conditions from permits that have been superseded and units that have been shutdown are not carried forward into the Title V Permit.

This is a standard general condition as written. The Division cannot make the requested change.

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- 29) In keeping with the intent of the permit shield provision in Section G.a.16.b – General Provisions (page 99), Arkema requests that KDAQ acknowledge the site-wide non-applicability of the following regulations by inclusion as such in the Title V Permit.

Regulation	Title	Notes
Standards of Performance for New Stationary Sources		
40 CFR 60 Subpart K	<u>Storage Vessels for Petroleum Liquids (9/11/73 to 5/18/78)</u>	Arkema does not use any petroleum liquid storage vessels > 40,000 gals.
40 CFR 60 Subpart K-a	<u>Storage Vessels for Petroleum Liquids (5/18/78 to 7/23/84)</u>	
40 CFR 60 Subpart VV	<u>Equipment Leaks of VOC in SOCM</u>	This subpart applies to facilities that produce SOCM chemicals as intermediate or final products. Arkema only generates benzene as a waste.
40 CFR 60 Subpart III	<u>VOC Emissions from the SOCM Air Oxidation Unit Processes</u>	Arkema does not produce any SOCM chemicals as <i>products</i> . Benzene is generated as a waste and does not meet the definition of <i>product</i> or <i>by-product</i> as stated by this regulation.
40 CFR 60 Subpart NNN	<u>VOC Emissions from SOCM Distillation Operations</u>	
40 CFR 60 Subpart RRR	<u>VOC Emissions from SOCM Reactor Processes</u>	
National Emission Standards for Hazardous Air Pollutants		
40 CFR 61 Subpart C	Standards for Beryllium	Arkema does not process beryllium, beryllium ore, oxides, alloys, or wastes nor does Arkema accept wastes to be burned from any of the Subpart E covered processes.
40 CFR 61 Subpart E	Standards for Mercury	The regulation applies to stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge. Arkema does not process mercury or use mercury chlor-alkali cells.
40 CFR 61 Subpart FF	Benzene Waste Operations	This subpart applies to hazardous waste treatment, storage, and disposal facilities that treat benzene waste from chemical manufacturing plants > 10 Mg/yr. Benzene waste treatment at Arkema is < 10 Mg/yr.
National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT)		
40 CFR 63 Subpart F	HON from SOCM	Per 40 CFR 63.107(b), gas streams from processes at this facility do not originate as a continuous flow from air oxidation reactors, distillation units, or reactors during operation of the chemical manufacturing process units.
40 CFR 63 Subpart G	HON from SOCM for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	
40 CFR 63 Subpart H	HON for Equipment Leaks	
40 CFR 63 Subpart I	HON for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks	
40 CFR 63 Subpart MMM	Pesticide Active Ingredient Production NESHAP	With the issuance of this Title V Permit, Arkema will be a synthetic minor source for HAPs and therefore, Exempt from the MACT standards.
40 CFR 63 Subpart FFFF	Miscellaneous Organic NESHAP	
40 CFR 63 Subpart EEEE	Organic Liquid Distribution NESHAP	
40 CFR 63 Subpart ZZZZ	Reciprocating Internal Combustion Engine MACT	
40 CFR 63 Subpart GGGGG	Site Remediation NESHAP	

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Regulation	Title	Notes
40 CFR 63 Subpart DDDDD	Boiler and Process Heater NESHP	

Arkema requests that the permit shield provisions extend to certain emission unit-specific non-applicable regulations as listed in the table below by inclusion in the Title V Permit.

Regulation	Title	Notes
<i>Process Area B-02</i>		
40 CFR 60 Subpart D-c	Small Steam Generating Units	Emission points 01, 02, and 03 (Boilers #4, #5, and #7 respectively) were installed prior to 6/9/89.
<i>Process Area B-17</i>		
40 CFR 60 Subpart K-b	<u>Storage Vessels for Petroleum Liquids (after 7/23/84)</u>	Process Area B-17 does not have any tanks > 75 m <sup>3</sup> storing volatile organic liquids with a maximum true vapor pressure > 15.0 kPa.
<i>Process Area B-52</i>		
40 CFR 60 Subpart D-c	Small Steam Generating Units	Emission point142 (X5-IR52) is a steam generating boiler installed prior to 6/9/89 and regulated by 40 CFR 63 Subpart EEE as part of the hazardous waste incinerator.
<i>Process Areas B-06, B-33, and B-39</i>		
40 CFR 51.166 Subpart I	Prevention of Significant Deterioration of Air Quality	Potential emissions from these three areas are less than the major source thresholds established by these regulations.
401 KAR 51:017	Prevention of Significant Deterioration of Air Quality	
401 KAR 61:060	Existing Sources Using Organic Solvents.	Because these units have been repermited as new emission units with the issuance of this Title V Permit, they are not considered <i>existing</i> sources.

The Division has inserted the tables as requested, following the Table of Contents. 40 CFR 61 Subpart E has been removed from the first table, however, as it does apply to the facility. Additionally, for Process Area B-52, 40 CFR 60 Subpart Dc in the second table has been removed. Subpart Dc does not apply, but the description may cause more confusion than necessary.

Also, in 40 CFR 60 Subparts III, NNN, and RRR (first table) the words “as stated by this regulation” have been replaced by “as defined in 40 CFR 60.611.”

- 30) Arkema requests that KDAQ revise Section 9 – Compliance Schedule (B-06, page 14/B-33, page 38/B-39, page 43) as follows: “*The issuance of this permit serves as the **minor source** construction permit for Process Area...*” This will confirm consistency with the permit application and permit basis documents.

This is not a necessary clarification. The wording here remains as originally written in the draft permit.

Additionally, the following corrections and clarifications have been made:

- On page 11, B.5.a, “(raw) material)” has been changed to “(raw material)”.

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- 2) On page 12, PRODUCTION AREA B-06 Table, all installation dates have been corrected from 2005 to 2006.
- 3) On page 36, PRODUCTION AREA B-33 Table, all installation dates have been corrected from 2005 to 2006.
- 4) On pages 39-40, PRODUCTION AREA B-39 Table, all installation dates have been corrected from 2005 to 2006.
- 5) On page 67, condition B.2.b.3 (B-52) has been deleted because Subpart C is not applicable (see Arkema comment #16 and response above).
- 6) On page 70, the sequence in Section B.4.a.11 has been corrected from a, e, c, d to a, b, c, d.

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.